

## SNP Administrative Review Findings

## Clay Community Schools (1125)

## Program Year 2018

## Clay Community Schools (1125)

1013 S. Forest Ave.  
Brazil, IN 47834-3182

## Food Service Contact

Mrs. Patty Dyer  
Director of Food Service  
(812) 443-4461

## Executive Contact

Mr. Ernie Simpson  
Human Resource  
(812) 443-4461

No. of Sites / Reviewed: 10 / 2  
Month of Review: March 2018

## Commendations

- \* Review materials were organized and readily available.
- \* Batch cooking was noted at Jackson Township School, ensuring the best food quality for students.
- \* Students at East Side Elementary were very polite and seemed to genuinely enjoy their meals.

## Certification and Benefit Issuance - Clay Community Schools (1125)

## 126. Certification Benefits/Issuance Review Method, applications correctly approved?

**Finding 9017: The application approval process is not implemented correctly.**

Based on the selected students, eligibility determination errors were found, as listed on the SFA-1. The sponsor accepted a Medicaid number as documentation for free meals for one household who was previously denied based on income. Medicaid numbers cannot be accepted on applications. As a result, the household eligibility status will be changed from free to denied.

**Corrective Action:**

The sponsor must ensure Medicaid numbers are not accepted as documentation of eligibility on free and reduced meal applications. Only Medicaid matches found via the direct certification process will be used as free or reduced meal eligibility documentation. The sponsor has sent a letter to the household giving 10 days' notice of termination of meal benefits. Additional response is not required.

**Technical Assistance:**

Medicaid eligibility for free and reduced meals was discussed with the sponsor the day of review.

## 133. Direct Certifications correctly certified?

**Finding 9000: Other Finding****Technical Assistance:**

When comparing the DC list to the student benefit roster it appears some students approved for free meals based on income were actually directly certified for free meals. Since the sponsor is considering CEP, a thorough review of direct certification documents against eligibility rosters should be conducted. The eligibility of students was not affected; therefore, this will be considered a technical assistance note rather than a finding.

## 141. Benefits extended to students in household receiving SNAP, TANF, FDPIR benefits?

**Finding 9033: The SFA does not accurately extend benefits to students living in a household receiving SNAP, TANF or FDPIR benefits.**

In one instance, free benefits for a student qualifying based on food stamps was not extended to another student in the household. The other student was receiving reduced benefits based on income.

**Corrective Action:**

The sponsor will ensure benefits are accurately extended to students living in the same household with the exception of foster children. The sponsor has sent a letter to the household notifying of the increase in benefits for one student in the household. Additional response is not required.

**Technical Assistance:**

Requirements for extending benefits were discussed the day of review.

**SNP Administrative Review Findings**  
**Program Year 2018****Clay Community Schools (1125)****Verification - Clay Community Schools (1125)**

207. *Verified applications on file match FNS-742 and Off Site question #200?*

**Finding 9036: Verified applications on file do not match number reported on FNS-742.**

The SFA's response to question #200 of the Off-site Assessment Tool and the number of Verified applications reported on the FNS-742 are inconsistent with the number of Verified applications on file. The sponsor verified 15 applications rather than 14.

**Corrective Action:**

The sponsor will ensure exactly three percent of applications on file as of October 1 will be verified. Additional applications may be verified for cause as needed. Additional response not required.

**Technical Assistance:**

Verification requirements were discussed the day of review. The sponsor was reminded that a confirmation review was not required for on-line applications but is required for paper applications. The confirmation review official cannot be the person who initially approved the application. Copies of the verified applications as well as all letters sent and correspondence received in reference to verification should be saved as documentation.

**General Program Compliance - Clay Community Schools (1125)**

1007. *On-site observation validate Off-Site Assessment Tool responses to Local School Wellness Policy questions?*

**Finding 9000: Other Finding****Technical Assistance:**

Technical assistance was provided regarding the proposed revision of the wellness policy. The recent review of the policy should be posted for public viewing. Additionally, the wording regarding food fundraisers contradicts the state limits and should be clarified. The current wording states two fundraisers were permitted per building but the state limits fundraisers to two days per school year regardless of how many different fundraisers are held on those two days.

1403. *Did any review of agricultural food components indicate violations of the Buy American provision?*

**Finding 9000: Other Finding**

A review of agricultural food components indicated violations of the Buy American provision. Grapes from Chile were noted in storage at Jackson Township.

**Corrective Action:**

The sponsor will purchase domestic products going forward unless an exception can be made by the SFA for one of the following reasons:

- The agricultural food component is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or
- Competitive bids reveal the costs of domestic agricultural food components are significantly higher than the non-domestic ones.
- The exception was related to the domestic food as prohibitively costly or limited quantity availability.

The food service director will discuss the matter with all managers to ensure compliant products are purchased. Additional response is not required.

**Technical Assistance:**

The Buy American Provision was discussed the day of review.

## SNP Administrative Review Findings

## Clay Community Schools (1125)

## Program Year 2018

## East Side Elementary School (0941)

1013 S. Forest Ave.  
Brazil, IN 47834-3182

## Food Service Contact

Ms. Mindy Hoopingarner  
Manager  
(812) 448-8755

Month of Review: March 2018

Date of Onsite Review: April 25, 2018

## Meal Components &amp; Quantities - East Side Elementary School (0941)

401. DOR - meals selected by students contain all required components/quantities? Enter data.

**Finding 9000: Other Finding**

One breakfast counted for reimbursement the day of review did not contain a fruit or vegetable; however, this was a single instance of an oversight as other students without a fruit or vegetable were instructed to select a fruit or vegetable to make a meal.

**Corrective Action:**

The sponsor will be more cognoscente of student trays to ensure all meals contain either a fruit or vegetable. Additional response not required.

**Technical Assistance:**

Fruit and vegetable requirement for OVS was discussed with the sponsor the day of review.

403. DOR - two varieties of milk available, allowable substitutions? Enter data.

**Finding 9054: Milk substitutions on Day of Review not allowable. \*Repeat Finding**

Milk substitutions made on the Day of Review were not allowable per 7CFR 210.10. The milk substitute offered (8 oz. silk chocolate milk) did not meet or exceed the nutrient standards of 8 fl. oz. cow's milk.

**Corrective Action:**

The sponsor will ensure milk substitutes are nutritionally equivalent to cow's milk. Additional response is not required.

**Technical Assistance:**

The fluid milk substitution informational chart can be found at the following link:

<https://www.doe.in.gov/sites/default/files/nutrition/fluid-milk-substitutions-child-nutrition-programs-054238.pdf>, provided to the sponsor the day of review.

410. Review period menus and production records - Quantities and meal pattern requirements met? Enter data.

**Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.**

Recipes and productions records were reviewed for the Review Period to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served. Due to incorrect crediting of the PBJ, the weekly grain requirement was not met for students in grades K-5 for lunch. This finding is applicable to all elementary schools.

**Corrective Action:**

The sponsor will adjust the PBJ recipe to ensure that over the course of the week, the minimum grain requirements are met. Per the manager, 3 packages of whole grain saltine crackers or a package of whole grain cheddar crackers will be offered with the PBJ instead of 2 packages of crackers. Additional response not required; however, future repeat findings regarding insufficient portion sizes will result in fiscal action.

**Technical Assistance:**

The school was provided technical assistance during the on-site visit. Repeat violations in meal pattern quantities will result in fiscal action.

## General Program Compliance - East Side Elementary School (0941)

**SNP Administrative Review Findings****Clay Community Schools (1125)****Program Year 2018***1106. Fundraisers – observe State defined limits?***Finding 9162: The school is not observing the State-defined limit on fundraisers to determine exempt/non-exempt fundraiser status.**

For fundraisers determined to be non-exempt under the State-defined limit on fundraisers (not including fundraisers on weekends, off-site, or during non-school hours), the school is not meeting the Smart Snack standards for complying with Smart Snacks requirements. A fundraiser selling chocolate roses was held for 4 days. Per the principal students could consume the chocolate during the school day.

**Corrective Action:**

In the future, fundraisers selling food items for consumption during the school day in which items are not smart snack compliant will be limited to two days per school year. Additional response not required.

**Technical Assistance:**

The reviewer discussed non-compliant food item sales with the principal the day of review. The idea was presented to pre-sell the roses multiple days but only hand them out on the last day of sales.

*1406. Most recent Food safety inspection posted, visible to public?***Finding 9147: Most recent food safety inspection report is not posted in a publicly visible location.**

Most recent food safety inspection report is not posted in a publicly visible location.

**Corrective Action:**

The sponsor posted a copy of the most current food safety inspection for public viewing the day of review. It will be updated each time a new inspection is received. Additional response is not required.

**Technical Assistance:**

The requirement to post the most current food safety inspection for public viewing was discussed with the kitchen manager the day of review.

**SNP Administrative Review Findings****Clay Community Schools (1125)****Program Year 2018****Jackson Township Elementary (0901)**

1013 S. Forest Ave.  
Brazil, IN 47834-3182

**Food Service Contact**

Mrs. Patsy Woolery  
Manager  
(812) 986-2177

Month of Review: March 2018

Date of Onsite Review: April 26, 2018

**Meal Components & Quantities - Jackson Township Elementary (0901)**

402. DOR - quantities served meet daily meal pattern requirements for age/grade groups? Enter data

**Finding 9000: Other Finding****Technical Assistance:**

TA given for meat and cheese used in salads. Containers need to be full to credit as the planned 2 meat servings.

410. Review period menus and production records - Quantities and meal pattern requirements met? Enter data.

**Finding 9000: Other Finding**

Condiment usage is not consistently recorded on the production record.

**Corrective Action:**

The sponsor will ensure all items offered as part of the reimbursable meal are recorded on the production record each day. All columns of the production record must be recorded for each item. Additional response not required.

**Technical Assistance:**

Production record documentation requirements were discussed the day of review. The manager stated she didn't know it was required to record condiment usage until recently.

**General Program Compliance - Jackson Township Elementary (0901)**

1406. Most recent Food safety inspection posted, visible to public?

**Finding 9147: Most recent food safety inspection report is not posted in a publicly visible location.**

Most recent food safety inspection report is not posted in a publicly visible location.

**Corrective Action:**

The sponsor will post a copy of the most current food safety inspection report in a publicly visible location by the end of the day. Each time a new inspection occurs the posted report will be updated. No additional response needed.

**Technical Assistance:**

The requirement to post the most current inspection was discussed the day of review.